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September 2, 2021

The Honorable Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*Re: United States v. Ari Teman, 19 CR 696 (PAE)*

Dear Judge Engelmayer:

By order dated August 30, 2021 [Docket No. 272], the Court ordered defense counsel to submit, by tomorrow, any declaration in support of their application to be relieved from their representation of Mr. Teman. By the same order, the Court ordered Mr. Teman to submit any response by September 10, 2021.

We respectfully request that the Court reconsider its order for two reasons. *First*, Mr. Teman has advised us that he has fired us and does not oppose our withdrawal. *Second*, owing to our ethical concerns, we consulted Ellen Yaroshefsky, the Howard Lichtenstein Distinguished Professor of Legal Ethics at Hofstra University's Maurice A. Deane School of Law and Executive Director of the Monroe Freedman Institute for the Study of Legal Ethics. See Exhibit A (*curriculum vitae*). We briefed Professor Yaroshefsky on the bases for our motion to withdraw. Professor Yaroshefsky has been tending to a family health emergency and is thus unable to provide a written opinion to the Court. She has, however, authorized us to advise the Court that, based on the information provided to her, it is her opinion as an expert in legal ethics that we cannot ethically continue to represent Mr. Teman nor disclose the bases for our motion to the Court. While Professor Yaroshefsky is unable to provide a written opinion, she advised us that she is available to appear via video.

We respectfully request that your Honor grant our motion to withdraw.

Respectfully submitted,

/s/ Andrew J. Frisch  
Andrew J. Frisch

/s/ Susan G. Kellman  
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